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6 *Attorneys for Petitioners*

7
 8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10
 11 IN THE MATTER OF THE
 12 PEE PEE POP TRUST, PEE PEE POP
 TRUST II, PEE PEE POP TRUST III, MAN
 CUB TRUST, MAN CUB TRUST II, MAN
 CUB TRUST III, DATED JULY 22, 2013.

13 Case No. 3:19-cv-00240-MMD-CBC

14 [PROPOSED] STIPULATED
 DISCOVERY PLAN AND
 SCHEDULING ORDER

15 SUBMITTED IN COMPLIANCE
 WITH LR 26-1(b)

16
 17 Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, John Hurry, Trustee of Pee Pee Pop
 Trust, Pee Pee Pop Trust II, Pee Pee Pop Trust III, Man Cub Trust, Man Cub Trust II and Man
 Cub Trust III dated July 22, 2013, Alpine Securities Corporation, and Scottsdale Capital Advisors
 Corporation (“Corporations” and collectively “Petitioners”) and Respondent Financial Industry
 Regulatory Authority, Inc. (“FINRA”), submit this proposed Stipulated Discovery Plan and
 Scheduling Order in the above-referenced case.

23 A. **Meet and Confer.** Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1(a), a telephonic
 meeting will be held on August 5, 2019 between counsel for Petitioners and FINRA.

25 B. **Initial Disclosures.** The Parties stipulate and agree that the deadline to make initial
 disclosures pursuant to Fed. R. Civ. P. 26(a)(1)(C) shall be **August 19, 2019**.

27 C. **Discovery Plan.**

28 1. **Discovery Cut-Off Date.** Pursuant to the telephonic status conference held on

1 August 5, 2019, the discovery cut-off date shall be **January 27, 2020**.

2 2. Amending the Pleadings and Adding Parties. The Parties shall be permitted to
3 amend pleadings or to add parties until **October 29, 2019**.

4 3. Expert Witnesses. The last day to disclose initial expert witnesses shall be
5 **November 27, 2019**. The last day to disclose rebuttal expert witnesses shall be **December 27,**
6 **2019**.

7 4. Pretrial Order. The deadline to file the joint pretrial order will be **March 27, 2020**.
8 The disclosures required by Fed. R. Civ. P. 26(a)(3) and Local Rule 16-4 shall be made in the
9 joint pretrial order.

10 5. Dispositive motions. FINRA filed a motion to dismiss on May 24, 2019 which is
11 fully briefed and submitted. Petitioners filed a motion to remand on June 10, 2019 which is fully
12 briefed and submitted. The deadline to file any further dispositive motions will be **February 27,**
13 **2020**.

14 6. Interim Status Report. Pursuant to LR 26-3, an interim status report must be filed
15 no later than 60 days before the discovery cut-off date. The deadline to file the interim status
16 report is **November 27, 2019**.

17 7. Trial Date. Per the Court's Order on Jul 27, 2019 a case management conference
18 will be held on January 27, 2010, and if dispositive motions are still pending, will discuss how
19 best to proceed.

20 D. Other Items.

21 1. Alternative Dispute Resolution. Pursuant to LR 26-1(b)(7), the Parties certify that they
22 discussed the possibility of using alternative dispute resolution.

23 2. Alternative Forms of Case Disposition. Pursuant to LR 26-1(b)(8), the Parties certify that
24 they considered consent to trial by a magistrate judge or use of the Short Trial Program.

25 3. Clawback Agreement. The inadvertent disclosure of documents shall be governed by
26 Federal Rule of Evidence 502 and Federal Rule of Civil Procedure 26(b)(5)(B).

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1 Dated: August 5, 2019
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7 By: */s/ William E. Peterson*
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Dated: August 5 2019

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By: */s/ Gregory A. Davis (with permission)*

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EXHIBIT 1 – PROPOSED ORDER

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19 CUB TRUST III, DATED JULY 22, 2013.

20 Case No. 3:19-cv-00240-MMD-CBC

21 STIPULATED DISCOVERY PLAN
22 AND SCHEDULING ORDER

23 SUBMITTED IN COMPLIANCE
24 WITH LR 26-1(b)

25 Pursuant to the [Proposed] Stipulated Discovery and Scheduling Order filed by the
26 Parties, this Court order approves the following deadlines in the above-referenced case::

27 1. Initial Disclosures. The Parties stipulate and agree that the deadline to make initial
28 disclosures pursuant to Fed. R. Civ. P. 26(a)(1)(C) shall be **August 19, 2019**.

29 2. Discovery Cut-Off Date. Pursuant to the telephonic status conference held on
30 August 5, 2019, the discovery cut-off date shall be **January 27, 2020**.

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9 8. Trial Date. Per the Court's Order on Jul 27, 2019 a case management conference
10 will be held on January 27, 2010, and if dispositive motions are still pending, will discuss how
11 best to proceed.

12 || IT IS SO ORDERED.

Dane
United States Magistrate Judge
DATED: 8/6/2019